

AUG 13 2012

Mr. Lawrence C. Rosen  
Environmental Operations, Incorporated  
1530 South Second Street, Suite 200  
St. Louis, Missouri 63104-4500

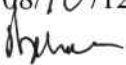
RE: Comments on the Baseline Groundwater Monitoring Semi-Annual Report for Quarters 1 and 2  
for the Solutia - J.F. Queeny Site, St. Louis, Missouri  
EPA ID No. MOD 004 954 111


Dear Mr. Rosen:

The U.S. Environmental Protection Agency Region 7 and the Missouri Department of Natural Resources (MDNR) have reviewed the subject document and are providing the following comments to be addressed in a revised submittal within 30 days of receipt of this letter.

1. A table that provides monitoring well construction details should be included in this report, as this information is necessary for interpreting sampling results. The table should include information that readily indicates which hydrostratigraphic zone each well is monitoring. In addition, the table should provide the date of construction, the elevation of the ground surface, the depth to bedrock (if encountered), total depth of boring, screen interval length, and the top of the screen interval.
2. The Units designation at the bottom of Table MW-2A, Former FF Building is in error and needs to be corrected to the appropriate units. The Units designations in other tables are also in error and should be reviewed and corrected. The Units should be the same for all of the laboratory constituents (except for water quality parameters) in all of the tables to allow for the reader to readily compare results. The spelling of "Constituent" should be corrected in the tables.
3. Although the Figures provide the elevation of the potentiometric surface at each monitoring well, each table that is reporting data should provide the elevation of the potentiometric surface for each sampling event in the Field Data portion of the tables.
4. The tables should include a column that provides the value of the Maximum Contaminant Levels (MCLs) for the constituents of concern or the current Tap Water value listed in the EPA's Regional Screening Levels Table.
5. "ORP" should be included in the Acronyms List.
6. Monitoring Wells REC 1 and REC 4 do not appear to be monitoring points for the bedrock sand potentiometric horizon, and should be removed from Figures 4 and 6.
7. All of the historical monitoring results should be provided for Monitoring Wells GM-1, MW-9, MW-11A, MW-13, MW-19, and MW-23.

AWMD/WRAP/KNRP/BM:bft:08/07/12:H:AWMD/WRAP/Cores12/BM:commentltr.BaselineGW  
monitoringreport,8.2012.doc

KNRP  
Morrison  
08/10/12  


KNRP  
Johnson  
08/10/12  


RCRA



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8. Section 1.1 states that the Report includes Field Sheets; however, field sheets were not provided.
9. The Report should provide a figure that shows the injection point locations for the interim action being implemented at the site.

If you have any questions concerning these comments, please call me at (913) 551-7755, or Christine Kump-Mitchell at (314) 416-2960.

Sincerely,

Bruce Morrison  
Project Manager  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

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Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Morrison". The signature is fluid and cursive, with a large initial "B" and a stylized "M".

Bruce Morrison  
Project Manager  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR